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December 26, 2012

**VIA ELECTRONIC COURT FILING**

Hon. Joseph H. Rodriguez, U.S.D.J.  
Mitchell H. Cohen U.S. Courthouse  
One John F. Gerry Plaza  
Camden, New Jersey 08101

**RE: Pennington v. New England Compounding Pharmacy, Inc., et al.**

U.S. District Court for the District of New Jersey  
Case No.: 1:12-cv-07179-JHR-KMW

Dear Judge Rodriguez:

This office represents Defendant Ameridose, LLC. On November 19, 2012 Defendant New England Compounding Pharmacy, Inc. d/b/a New England Compounding Center (“NECC”) removed this case from the Superior Court of New Jersey, Cumberland County to the United States District Court for the District of New Jersey. On December 11, 2012, Plaintiffs filed a Motion to Remand, presently returnable on January 7, 2013. On December 24, 2012, NECC filed a Notice of Stay by Reason of Bankruptcy.

In light of NECC’s filing, we respectfully request an adjournment of the January 7 motion day to the next available motion day, January 22, 2013. We have been advised that defendant NECC, prior to filing its Notice of Stay, received consent from Plaintiffs’ counsel for an adjournment. We have also called Plaintiffs’ counsel to confirm but have not been able to reach them yet. We thank the Court for its attention to this matter.

Respectfully,

MCELROY, DEUTSCH, MULVANEY & CARPENTER, LLP

*/s/ Walter R. Krzastek*

Walter R. Krzastek

Cc: All Counsel of Record (via ECF)